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*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

) Case No. 07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:

ALL INDIRECT PURCHASER ACTIONS

) **DECLARATION OF ANDREW
LUCARELLI IN SUPPORT OF IRICO
DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
BEIJING MATSUSHITA COLOR CRT
CO., LTD. MATERIAL SHOULD BE
SEALED PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(f)**

1 I, Andrew Lucarelli, declare as follows:

2 1. I am an attorney admitted to practice law in Washington, D.C. and am employed
3 by the law firm of Baker Botts L.L.P., which represents Defendants Irico Group Corporation
4 (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”) (collectively, “Irico
5 Defendants”). I make this Declaration based on my personal knowledge and in support of the
6 Irico Defendants’ Administrative Motion to Consider Whether Beijing Matsushita Color CRT
7 Co., Ltd. Material Should Be Sealed Pursuant to Civil Local Rules 7-11 and 79-5(f).

8 2. Attached hereto as Exhibit 11 is a true and correct copy of a certified translation
9 of a document produced by defendant Beijing-Matsushita Color CRT Corp. (hereinafter,
10 “BMCC”) in this litigation and bearing the Bates label BMCC-CRT000113367

11 1. Attached hereto as Exhibit 12 is a true and correct copy of a certified translation
12 of a document produced by defendant BMCC in this litigation and bearing the Bates label
13 BMCC-CRT000113368.

14 2. Attached hereto as Exhibit 13 is a true and correct copy of a certified translation
15 of a document produced by defendant BMCC in this litigation and bearing the Bates label
16 BMCC-CRT000113372.

17 3. Attached hereto as Exhibit 14 is a true and correct copy of a certified translation
18 of a document produced by defendant BMCC in this litigation and bearing the Bates label
19 BMCC-CRT000113374.

20 4. Attached hereto as Exhibit 15 is a true and correct copy of a certified translation
21 of a document produced by defendant BMCC in this litigation and bearing the Bates label
22 BMCC-CRT000113378.

23 5. Attached hereto as Exhibit 16 is a true and correct copy of a certified translation
24 of a document produced by defendant BMCC in this litigation and bearing the Bates label
25 BMCC-CRT000113379.

26 6. Attached hereto as Exhibit 17 is a true and correct copy of a certified translation
27 of a document produced by defendant BMCC in this litigation and bearing the Bates label
28 BMCC-CRT000113380.

1 7. Attached hereto as Exhibit 18 is a true and correct copy of a certified translation
2 of a document produced by defendant BMCC in this litigation and bearing the Bates label
3 BMCC-CRT000113381.

4 8. Attached hereto as Exhibit 19 is a true and correct copy of a certified translation
5 of a document produced by defendant BMCC in this litigation and bearing the Bates label
6 BMCC-CRT000113382.

7 9. Attached hereto as Exhibit 20 is a true and correct copy of a certified translation
8 of a document produced by defendant BMCC in this litigation and bearing the Bates label
9 BMCC-CRT000113392-3393.

10 10. Attached hereto as Exhibit 21 is a true and correct copy of a certified translation
11 of a document produced by defendant BMCC in this litigation and bearing the Bates label
12 BMCC-CRT000113394.

13 11. Attached hereto as Exhibit 22 is a true and correct copy of a certified translation
14 of a document produced by defendant BMCC in this litigation and bearing the Bates label
15 BMCC-CRT000113395.

16 12. Attached hereto as Exhibit 23 is a true and correct copy of a certified translation
17 of a document produced by defendant BMCC in this litigation and bearing the Bates label
18 BMCC-CRT000113396.

19 13. Attached hereto as Exhibit 24 is a true and correct copy of a certified translation
20 of a document produced by defendant BMCC in this litigation and bearing the Bates label
21 BMCC-CRT000113397.

22 14. Attached hereto as Exhibit 25 is a true and correct copy of a certified translation
23 of a document produced by defendant BMCC in this litigation and bearing the Bates label
24 BMCC-CRT000113398.

25 15. Attached hereto as Exhibit 26 is a true and correct copy of a certified translation
26 of a document produced by defendant BMCC in this litigation and bearing the Bates label
27 BMCC-CRT000113399.

1 16. Attached hereto as Exhibit 27 is a true and correct copy of a certified translation
2 of a document produced by defendant BMCC in this litigation and bearing the Bates label
3 BMCC- CRT000113400.

4 17. Attached hereto as Exhibit 28 is a true and correct copy of a certified translation
5 of a document produced by defendant BMCC in this litigation and bearing the Bates label
6 BMCC-CRT000113401.

7 18. Attached hereto as Exhibit 29 is a true and correct copy of a certified translation
8 of a document produced by defendant BMCC in this litigation and bearing the Bates label
9 BMCC-CRT000113402.

10 19. Attached hereto as Exhibit 30 is a true and correct copy of a certified translation
11 of a document produced by defendant BMCC in this litigation and bearing the Bates label
12 BMCC-CRT000113403.

13 20. Attached hereto as Exhibit 31 is a true and correct copy of a certified translation
14 of a document produced by defendant BMCC in this litigation and bearing the Bates label
15 BMCC-CRT000113404.

16 21. Attached hereto as Exhibit 32 is a true and correct copy of a certified translation
17 of a document produced by defendant BMCC in this litigation and bearing the Bates label
18 BMCC-CRT000113405.

19 22. Attached hereto as Exhibit 33 is a true and correct copy of a certified translation
20 of a document produced by defendant BMCC in this litigation and bearing the Bates label
21 BMCC-CRT000113406.

22 23. Attached hereto as Exhibit 34 is a true and correct copy of a certified translation
23 of a document produced by defendant BMCC in this litigation and bearing the Bates label
24 BMCC-CRT000113407.

25 24. Attached hereto as Exhibit 35 is a true and correct copy of a certified translation
26 of a document produced by defendant BMCC in this litigation and bearing the Bates label
27 BMCC-CRT000113408.

1 25. Attached hereto as Exhibit 36 is a true and correct copy of a certified translation
2 of a document produced by defendant BMCC in this litigation and bearing the Bates label
3 BMCC-CRT000113409.

4 26. Attached hereto as Exhibit 37 is a true and correct copy of a certified translation
5 of a document produced by defendant BMCC in this litigation and bearing the Bates label
6 BMCC-CRT000113410-3411.

7 27. Attached hereto as Exhibit 38 is a true and correct copy of a certified translation
8 of a document produced by defendant BMCC in this litigation and bearing the Bates label
9 BMCC-CRT000113412.

10 28. Attached hereto as Exhibit 39 is a true and correct copy of a certified translation
11 of a document produced by defendant BMCC in this litigation and bearing the Bates label
12 BMCC-CRT000113413.

13 29. Attached hereto as Exhibit 40 is a true and correct copy of a certified translation
14 of a document produced by defendant BMCC in this litigation and bearing the Bates label
15 BMCC-CRT000113414.

16 30. Attached hereto as Exhibit 41 is a true and correct copy of a certified translation
17 of a document produced by defendant BMCC in this litigation and bearing the Bates label
18 BMCC-CRT000113415.

19 31. Attached hereto as Exhibit 42 is a true and correct copy of a certified translation
20 of a document produced by defendant BMCC in this litigation and bearing the Bates label
21 BMCC-CRT000113416.

22 32. Attached hereto as Exhibit 43 is a true and correct copy of a certified translation
23 of a document produced by defendant BMCC in this litigation and bearing the Bates label
24 BMCC-CRT000113418-3419.

25 33. Attached hereto as Exhibit 48 is a true and correct copy of Deposition Exhibit
26 8559, which is a certified translation of a document produced by defendant BMCC in this
27 litigation and bearing the Bates label BMCC-CRT000113389-3391.
28

34. Attached hereto as Exhibit 49 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000113384-3388.

35. Attached hereto as Exhibit 68 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000181673-1677.

36. Attached hereto as Exhibit 69 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000142685.

37. Attached hereto as Exhibit 70 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000138732-8735.

38. Attached hereto as Exhibit 71 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000139461-9463.

39. Attached hereto as Exhibit 72 is a true and correct copy of a certified translation of a document produced by defendant BMCC in this litigation and bearing the Bates label BMCC-CRT000054691.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of July, 2023, in Rockville, Maryland.

/s/ Andrew L. Lucarelli

Andrew L. Lucarelli (*pro hac vice*)

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